EXHIBIT 2

IN THE CIRCUIT COURT FOR VOLUSIA COUNTY, FLORIDA

CIRCUIT CIVIL NO. 81-3472-CA-01-F

GABRIEL CAZARES and MARGARET CAZARES, his wife,

Plaintiffs,

vs.

THE CHURCH OF SCIENTOLOGY OF CALIFORNIA, et al.,

Defendants.

VERIFILD MOTION TO QUASH DEPOSITION SUBPOENA SERVED ON MICHAEL J. FLYNN, ESQUIRE

Michael J. Flynn, pro se, hereby moves this Honorable Court to quash the subpoena served on him on Monday, April 19, 1982 by the Defendants in the above entitled case, which subpoena requires attorney Flynn to appear for a deposition scheduled on Friday, April 23, 1982. In support of said Motion, attorney Flynn states as follows:

1. Attorney Flynn (the deponent) is a resident of Massachusetts where he also maintains an active law practice.

2. The deponent has no personal knowledge of any facts relating to the above case. The deponent has never represented or had any professional relationship as counsel for the Plaintiffs in said case. The deponent is involved in litigation in various jurisdictions against the Church of Scientology, but said litigation does not relate to the above case, other than the fact that the Church of Scientology is a party in separate litigation. There is no material issue in the subject suit which deponent could provide any testimony.

3. The deponent does not intend at this time to remain in the State of Florida throughout the time and date required for his deposition. Remaining in Florida throughout the time required

would constitute a considerable hardship on the deponent because of the requirements of his law practice in Massachusetts.

4. The Church of Scientology is unlawfully using legal process to harass the deponent and interrupt his law practice through the use of the deposition procedure in a case in which deponent has no involvement or personal knowledge relative to any issue. Church of Scientology has demonstrated a pattern of such judicial abuse as reflected by the subject matter of the above case, as well as numerous other frivolous and abusive law suits manufactured by Church of Scientology in many Courts in the United States. See eg., Allard v. Church of Scientology of California, App., 129 Cal. Rptr. 797 (2nd DCA 1976).

Wherefore, deponent respectfully requests that this Honorable Court quash the subpoena requiring attorney Flynn to appear for a deposition on the above case.

DATED this 12 day of April, 1982.

MICHAEL J. FLYNN, Pro Se
Signed under the pains and
penalties of perjury.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished, by mail, to the following attorneys of record this 21st day of April, 1982:

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